

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

ADAMA SOW, DAVID JAKLEVIC, ALEXANDRA DE
MUCHA PINO, OSCAR RIOS, BARBARA ROSS,
MATTHEW BREDDER, SABRINA ZURKUHLIN, MARIA
SALAZAR, DARA PLUCHINO, and SAVITRIDURKEE,
on behalf of themselves and others similarly situated

Plaintiff

Case Number

vs.

21-CV-533

CITY OF NEW YORK; MAYOR BILL DE BLASIO, NEW YORK CITY POLICE
DEPARTMENT COMMISSIONER DERMOT SHEA, NEW YORK CITY POLICE
DEPARTMENT CHIEF OF DEPARTMENT TERENCE MONAHAN; NYPD
DETECTIVE EDWARD CARRASCO (SHIELD NO. 1567); NYPD OFFICER
TALHA AHMAD (SHIELD NO. 21358); NYPD OFFICER KEVIN AGRO
(SHIELD NO. 8054); NYPD OFFICERS JOHN and JANE DOES # 1- 40

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

PEOPLE OF THE STATE OF NEW YORK,
by Leticia James, Attorney General of
the State of New York

Plaintiff

Case Number

vs.

21-CV-322 (CM)

CITY OF NEW YORK, et al.

Defendant

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

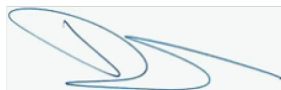
(If so, set forth procedural status and summarize any court rulings.)

Complaint filed on January 14, 2021. On January 19, 2021, case accepted as related to 1:20-cv-08924-CM. A telephone conference is scheduled for Friday, February 5, 2021 at 11:30 A.M.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The Complaint in this matter alleges the same course of unconstitutional conduct, in the same location, during the same time period, by the same Defendants as is alleged in *People of New York v. City of New York, et al.* Both the Complaint in this matter and the complaint in *People of the State of New York* allege that the New York City Police Department engaged in the retaliatory and unconstitutional practice of arresting protesters en masse and using excessive force against them in 2020, in violation of protesters' First, Fourth, and Fourteenth Amendment rights. Moreover, the injunctive relief sought in the *People of New York* case substantially overlaps with the injunctive relief sought in this case.

Signature: _____

Date: 1/21/2021

Beldock, Levine & Hoffman LLP

Firm: _____